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USDA-AMS-TMO-NOP
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Dear Mr. Neal and National Organic Standards Board:

PGP International is a leading specialty ingredient supplier for crisp rice, extruded particulates, rice flours and blends, soy protein, crisp rice, sweet rice and a line of functional grain-based ingredients.

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. PGP International – An ABF Ingredients Company supports the continued allowance of the following substance(s):

Name of Substance	Location on National List (ie. 205.605(a))	Reason for continued allowance	Supporting Documents (research data or other international organic programs)
Calcium Phosphates (dibasic)	205.605	Allows for expansion control in extrusion. Organic alternative is not available.	Previous NOSB assessment still relevant
Lecithin	205.606	Used as an emulsifier. Organic alternative not available commercially.	Previous NOSB assessment still relevant
Tocopherols	205.605	Used as an antioxidant. Organic alternative not available commercially.	Previous NOSB assessment still relevant
Xanthan Gum	205.605	Use as a heat stable emulsifier. Organic alternative not available commercially.	Previous NOSB assessment still relevant

PGP International is also pursuing an Organic presence in the International Market including Japan. Please note that the above substances are part of the Food Additives list (Notification No.60 of the Ministry of Agriculture, Forestry and Fisheries) released by the Japanese Agricultural Standard of Organic Agricultural Products Processed Foods http://www.maff.go.jp/soshiki/syokuhin/hinshitu/e_label/index.htm.

We look forward to the continued allowance of the above substances in the National Organic Program National List.

Sincerely

Aman A Das

QA Professional

PGP International

An ABF Ingredients Company

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